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December 5, 2019

VIA ECF

Magistrate Judge Robert M. Levy
United State District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Richard Millerson v. David Frank and NW England Freight, Inc.
Docket No.: 18-CV-6736-ARR-RML

Honorable Judge Levy:

London Fischer is counsel of record for the Defendant New England Motor Freight, Inc. (s/h/a NW England Freight Inc.) and David Frank in the above referenced action. Please allow this letter to serve as a status report, which the Docket indicates is required by December 15, 2019.

Pursuant to the November 20, 2019 Order of the Honorable John K. Sherwood, annexed hereto as Exhibit "A" (the "Order"), the TRO has been extended through February 11, 2020.

The Order further reflects that a Joint Combined Plan of Liquidation and Disclosure Statement, which incorporates a consensual protocol to resolve Auto Liability Claims, including a settlement between and among the Debtors, the Committee, Protective Insurance Company, and United States Fire Insurance Company (the insurer at issue in this litigation), was approved on an interim basis by the Bankruptcy Court, with a final confirmation hearing on January 14, 2020. See Exhibit "B".

Annexed hereto as Exhibit "B" is the AUTO LIABILITY CLAIMS PROTOCOL SETTLEMENT AGREEMENT, which will govern the attempted resolution of all auto liability claims.

Should Your Honor require any further report concerning the status of the litigation, we stand ready to oblige.

Respectfully Submitted,



Matthew K. Finkelstein (MF-6029)

Mkf
Enclosures

cc: VIA ECF
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